

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SOUND AROUND, INC.,	)	
	)	
	)	
	Plaintiff,	) Case No.: 1:24-cv-01986-JHR
	)	
	)	
	v.	)
	)	
	)	
	)	Notice of Motion for
	)	Preliminary Injunction
MOISES FRIEDMAN, SHULIM ELIEZER	)	
ILOWITZ, ML IMPORTS, INC., CYRF, INC.,	)	
LRI GROUP, LLC, EXECUTIVE SERVICES,	)	
EXECUTIVE LAUNDRY, LLC, MDF	)	
MARKETING, INC., WORLD GROUP	)	
IMPORT, LLC, HEFEI PAIDONG OUTDOOR	)	
PRODUCTS CO., LTD.,	)	
	)	
	Defendants.	)

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**NOTICE OF MOTION FOR PRELIMINARY INJUNCTION**

**PLEASE TAKE NOTICE** that Plaintiff Sound Around Inc., by and through its attorneys, Holland & Knight LLP, will move this Court pursuant to Federal Rule of Civil Procedure 65 before the Honorable Jennifer H. Rearden, United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007-1312 as soon as the matter may be heard, for an Order granting a preliminary injunction (1) to enforce the restrictive covenants against the Individual Defendants, Friedman and Ilowitz, (2) ordering the return of all confidential, proprietary, and trade secret information, (3) enjoining the Defendants from continuing their unlawful activity, and (4) for other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Plaintiff Sound Around Inc. submits its Memorandum of Law, which is being filed contemporaneously with this notice, and the Declaration of Jeremiah Brach, with exhibits, which is being filed contemporaneously with this notice.

Dated: April 22, 2024

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ Marisa Marinelli  
787 Seventh Ave., 31st Floor  
New York, NY 10019  
(212) 513-3200  
[Marisa.Marinelli@hklaw.com](mailto:Marisa.Marinelli@hklaw.com)

Attorneys for Plaintiff Sound Around, Inc.

Jesus E. Cuza (*PHV submitted*)  
Florida Bar No. 428991  
Email: [jesus.cuza@hklaw.com](mailto:jesus.cuza@hklaw.com)  
Rebecca Canamero (*PHV submitted*)  
Florida Bar No. 86424  
Email: [rebecca.canamero@hklaw.com](mailto:rebecca.canamero@hklaw.com)  
Annelise Del Rivero  
Florida Bar No. 1003234 (*PHV submitted*)  
Email: [annelise.delrivero@hklaw.com](mailto:annelise.delrivero@hklaw.com)  
701 Brickell Avenue, Suite 3300  
Miami, Florida 33131